

Appl. No. 10/601,121  
Reply to Office action of 11/22/2004

### **REMARKS**

Based on the above amendments and following remarks, this application is deemed to be in condition for allowance and action to that end is respectfully requested.

### **Summary Of Amendments To Claims**

Applicant has canceled claims 1 through 22 and rewritten them as claims 23 through 30 to, among other things, particularly define the Applicant's invention. No new matter has been added.

### **Response To Claim Rejections - 35 U.S.C. § 112**

The Examiner rejected claims 9-10 under 35 U.S.C. § 112, second paragraph, as being indefinite for lack of antecedent basis. As noted above, Applicant has canceled claims 1 through 22 and rewritten them as claims 23 through 30 having the requisite antecedent basis. Accordingly, Applicant respectfully submits that the Examiner's rejections to the claims are overcome and withdrawal thereof is respectfully requested.

### **Response To Claim Rejections - 35 U.S.C. § 102**

Reconsideration of the rejection of the claims under 35 U.S.C. § 102(e) as being anticipated by Efland is respectfully requested.

For a claimed invention to be anticipated by a single prior art reference pursuant to 35 U.S.C. § 102(e), the reference must teach every aspect of the claimed invention either explicitly or impliedly. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d

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628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Further, "the identical invention must be shown [in the reference] in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Applicant respectfully submits that Efland fails to anticipate the claims because Efland is missing many of the limitations of each of claims 23 through 30.

Each of the claims define a novel lateral power MOSFET semiconductor device comprising: a semiconductor substrate; a plurality of first and second doped regions in said semiconductor substrate forming a plurality of source and drain elements respectively; the source and drain elements being arranged in respective rows each being defined by a layer of silicide; a first connectivity layer having a plurality of first runners and a plurality of second runners parallel to each other and orthogonal to said rows of source and drain elements, wherein said plurality of first runners are connected to said plurality of source element rows and said plurality of second runners are connected to said plurality of drain element rows; a second connectively layer having a plurality of third runners or pads and a plurality of fourth runners or pads, wherein said plurality of third runners or pads are multiply connected to said plurality of first runners and said plurality of fourth runners or pads are multiply connected to said plurality of second runners; wherein there are multiple electrical paths to said source and drain elements such that electrical current will flow to each of said source and drain elements along an electrical path having a minimum of resistance.

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Efland's invention, on the other hand, is fundamentally different from Applicant's invention. Efland does not show or suggest a lateral power MOSFET semiconductor device having several elements of each claim including source and drain elements being arranged in respective rows each being defined by a layer of silicide, and runners or pads which are multiply connected to a plurality of other runners wherein there are multiple electrical paths to said source and drain elements such that electrical current will flow to each of said source and drain elements along an electrical path having a minimum of resistance.

This structure, defined by the claims, provides a lateral power MOSFET semiconductor device with a low internal resistance which enhances the performance of the device.

Based on the above remarks, Applicant respectfully submits that the claimed invention is novel over the applied prior art. More particularly, the claims recite limitations that distinguish over Efland. Accordingly, the rejection under 35 U.S.C. § 102(e) is overcome and withdrawal thereof is respectfully requested.

#### **Response To Claim Rejections - 35 U.S.C. § 103(a)**

Reconsideration of the rejection of the claims under 35 U.S.C. § 103(a) as being unpatentable over Efland in view of Edcn is respectfully requested.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the

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reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art references (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on an applicant's disclosure in the specification. *See In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Applicant respectfully submits that the combination of Efland in view of Eden fails to render the claims obvious for the following reasons..

Neither of the references cited alone or in combination show or suggest the claimed elements pointed out above. Neither of the references cited provide multiple electrical paths to said source and drain elements such that electrical current will flow to each of said source and drain elements along an electrical path having a minimum of resistance.

Based on the above remarks, Applicant respectfully submits that the claimed invention is not obvious in light of the applied prior art. Accordingly, the rejection under 35 U.S.C. § 103(a) is overcome and withdrawal thereof is respectfully requested.

### CONCLUSION

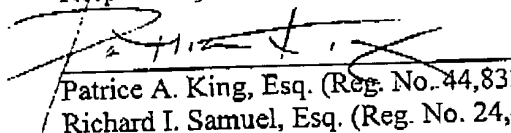
In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance and accordingly, allowance of the application is respectfully requested.

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Should the Examiner require or consider it advisable that the specification, claims and/or drawings be further amended or corrected in formal respects in order to place the case in condition for final allowance, then it is respectfully requested that such amendment or correction be carried out by Examiner's Amendment and the case passed to issue. Alternatively, should the Examiner feel that a personal discussion might be helpful in advancing this case to allowance, the Examiner is invited to telephone the undersigned.

The Commissioner is authorized to charge any required fees, including any extension and/or excess claim fees, any additional fees, or credit any overpayment to Deposit Account 06-0923. Applicant claims small entity status. See 37 C.F.R. 1.27.

Respectfully submitted for Applicants,

  
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